

## **REMARKS**

### **Status of Claims**

Claims 1-55 are pending in this application. By this Amendment, claims 1, 3, 5, 6, 18, 24, 33, 38, 40, 42, 43, and 55 have been amended and claims 2, 4, 23, 39, and 41 have been canceled. Reconsideration is respectfully requested in view of the above Amendments and the following remarks.

### **Rejection under 35 U.S.C. § 102(e)**

Claims 1 and 17 have been rejected under 35 U.S.C. §102(e) over U.S. Patent No. 6,430,627 to Utas. This rejection is respectfully traversed.

With regard to independent claim 1, Utas fails to show several claimed features. Utas fails to show a method for sharing system resource data including creating an instance of a central server and a central data store and storing a single shared copy of the resource data to be utilized by each of the two or more applications in the central data store. Additionally, Utas fails to show the single shared copy configured to allow sharing and concurrent access by the two or more applications through a separate communications interface between the central server and each application in order to avoid duplication of resources.

Utas discloses an enhanced processing technique for object-oriented software. In the technique disclosed by Utas, a single use dynamic object may be saved as a “quasi-singleton” that can be used repeatedly rather than being repeatedly created and destroyed in a traditional manner. A dynamic object is defined as a single use dynamic object if only a single use of the dynamic object will occur at one time when one or more applications are being executed. See Column 4, lines 4-10 of Utas. In the technique of Utas, a quasi-singleton is created for each identified single use dynamic object. The quasi-singleton is re-used in a sequential manner by one or more users. However, when a quasi-singleton is in use, the system marks it as unavailable. If a quasi-singleton is unavailable to a requesting application, another quasi-singleton is created for its use. See Column 5, lines 3-17 of Utas.

Accordingly, because the quasi-singleton can only be used by one application at a time, it is not suited for concurrent shared use as required by claim 1. Furthermore, since Utas creates an additional copy of a quasi-singleton if the originally created quasi-

singleton is in use, Utas fails to implement a single shared copy to avoid duplication of resources. Furthermore as noted above, Utas fails to show creating the central server and central data store for storing system resources.

Because Utas fails to show each and every feature of claim 1, Utas fails to anticipate claim 1. As noted in the Office Action, claim 17 is the computer readable medium equivalent to claim 1 and is therefore allowable over Utas for the reasons set forth above with respect to claim 1. Accordingly, withdrawal of the rejection of claims 1 and 17 under 35 U.S.C. §102 is respectfully requested.

**Rejection of claims 2-16, 18-32, and 38-55 under 35 U.S.C. § 103**

Claims 2-16, 18-32, and 38-55 have been rejected under 35 U.S.C. §103 as obvious over Utas in view of U.S. Patent No. 5,421,012 to Khoyi et al. (hereinafter "Khoyi"). This rejection is respectfully traversed.

Claims 2, 4, 23, 39, and 41 have been canceled rendering the rejection moot with respect to these claims. With regard to claims 3 and 5-16, these claims depend from claim 1, which is discussed in detail above. Khoyi fails to obviate the above-noted deficiencies of Utas including the provision of a single shared copy of system resources located in a central server and available for concurrent use by multiple applications in order to avoid duplication of resources. Accordingly, claims 3 and 5-16 define over the art of record for at least the reasons set forth above with respect to claim 1.

With regard to claim 18, the Office Action alleges that Utas discloses the features of the claimed invention, with the exception of the fact that the resource data is graphics display interface font resource data. The Office Action states that Khoyi discloses the graphics display interface font resource data.

Initially, as set forth with respect to claim 1 above, Utas fails to disclose obtaining a single shared copy of data from a source of system resources, creating an instance of a central server and a central font cache store and storing the single shared copy in the central font cache store. Utas further fails to disclose that the single shared copy is configured to allow concurrent sharing by the multiple instances of SDI applications.

Khoyi fails to obviate the deficiencies of Utas. The Office Action references Column 25, lines 45-65 (RESPACK) to illustrate the use of a central server and separate

communications interfaces. As noted in Khoyi, the function of RESPACK is to “create a resource, or to copy an existing resource and to modify the copied resource”. See Column 25, lines 57-61. Thus RESPACK is not a central server capable of storing a shared copy of a system resource. Instead, each resource is customized to a particular application and the modified resource is used in place of the original resource. Khoyi does not disclose concurrent sharing of single resource.

Thus, the references, even if combined, fail to disclose each and every feature of the invention independent claim 18. In order to make out a prima facie case of obviousness, the references cited by the Examiner must provide all of the elements of the invention as claimed and a suggestion to combine the disclosures of the various cited art references to make the claimed invention. *In re Geiger*, 815 F.2d 686,688 2 USPQ2d 1276, 1278 (Fed. Cir. 1987); *ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984).

Furthermore, no motivation would have existed to modify Utas with the disclosure of Khoyi in order to incorporate font resource data. Utas is related to call processing and not to displaying information. It is therefore unlikely that font data would be provided in the system of Utas. Accordingly, no motivation or suggestion would have existed to modify Utas with the disclosure of Khoyi to include font data.

In order to make a prima facie case of obviousness, a teaching or suggestion of the combination must be found in the prior art. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). Also, if a proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).

Claims 19-22 and 24-32 depend from claim 18 and define over Utas and Khoyi for at least the reasons set forth above with respect to claim 18.

With regard to claim 38, the Office action alleges (in section 27) that claim 38 is rejected for the same reasons as claim 1. Applicant respectfully submits that claim 38 defines over Utas for the reasons set forth above with respect to claim 1. Khoyi fails to obviate the above-noted deficiencies of Utas.

Claims 39, 40, and 42-54 depend from claim 38 and define over the art of record for at least the reasons set forth above with regard to claim 38.

With regard to claim 55, both Khoyi and Utas fail to disclose utilizing a cross-process server including a central server to enable applications to access and utilize a shared copy of system resource data. Additionally, both references fail to disclose concurrent sharing of resource data. As set forth above, in order to make a prima facie case of obviousness, all of the elements must be shown in the prior art. Accordingly, Khoyi and Utas fail to render obvious claim 55.

For the reasons set forth above, applicant respectfully submits that claims 3, 5-16, 18-22, 24-32, and 38, 40, and 42-55 define over the art of record. Claims 2, 4, 23, 39, and 41 have been canceled. Withdrawal of the rejection of claims 2-16, 18-32, and 38-55 under 35 U.S.C. §103 is therefore respectfully requested.

#### **Rejection of claims 33-37 under 35 U.S.C. §103**

Claims 33-37 have been rejected under 35 U.S.C. §103 as obvious over Khoyi in view of Utas. This rejection is respectfully traversed.

Khoyi fails to disclose A cross-process resource sharing system disposed between an operating system and multiple client applications that includes a central data store including a copy of shared resource data, the copy of shared resource data configured to be shared concurrently by multiple client applications.

As set forth above, the Office Action references Column 25, lines 45-65 (RESPACK) to illustrate the use of a central server and separate communications interfaces. As noted in Khoyi, the function of RESPACK is to “create a resource, or to copy an existing resource and to modify the copied resource”. See Column 25, lines 57-61. Thus RESPACK is not a central server capable of storing a shared resource for sharing between multiple client applications. Instead, each resource is customized to a particular application and the modified resource is used in place of the original resource. Khoyi does not disclose concurrent sharing of a single resource. Instead, each application has its own stored resource.

Also, as set forth above, Utas fails to disclose at least the use of a single shared resource accessible to multiple applications concurrently. Accordingly, even if

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combined, Utas and Khoyi would not have resulted in the invention of claim 33. The references combined fail to disclose each claimed feature.

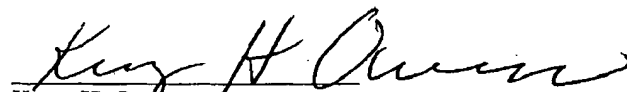
Claims 34-37 depend from claim 33. Accordingly, these dependent claims are allowable over the art of record for at least the reasons set forth above with respect to the independent base claim 33. Withdrawal of the rejection of these claims under 35 U.S.C. §103 is respectfully requested.

#### CONCLUSION

As set forth above, applicants respectfully submit that all pending claims are in condition for allowance. Applicants respectfully request that this application be allowed and passed to issue. Should however any issues remain prior to issuance of this application, the Examiner is urged to contact the undersigned to resolve the same. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112.

Respectfully submitted,

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